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10 *Attorney for Plaintiff Wilmington Trust, National Association, not in its individual capacity but*
11 *as Trustee of ARLP Securitization Trust, Series 2014-2*

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 WILMINGTON TRUST, NATIONAL
15 ASSOCIATION, NOT IN INDIVIDUAL
16 CAPACITY BUT AS TRUSTEE OF ARLP
17 SECURITIZATION TRUST, SERIES 2014-2,
18 a Federal Savings Bank,

19 Plaintiff,

20 vs.

21 COMMONWEALTH LAND TITLE
22 INSURANCE COMPANY,

23 Defendant.

Case No.: 2:18-cv-02023-GMN-PAL

24 **STIPULATION AND PROPOSED**
25 **ORDER EXTENDING PLAINTIFF'S**
26 **TIME PERIOD TO RESPOND TO**
27 **COMMONWEALTH'S MOTION TO**
28 **DISMISS [ECF NO. 10]**

(Second Request)

Plaintiff Wilmington Trust, National Association, not in its individual capacity but as
Trustee of ARLP Securitization Trust, Series 2014-2 (hereinafter "Wilmington"), and Defendant
Commonwealth Land Title Insurance Company, ("Commonwealth") (collectively, the "Parties"),
by and through their counsel of record, hereby stipulate and agree as follows.

Wilmington filed its Complaint on October 19, 2018 [ECF No. 1] and Commonwealth
filed its Motion to Dismiss on January 18, 2019 [ECF No. 10] (hereinafter "Motion"). The
Parties filed their first request to extend the time period to respond to Commonwealth's Motion
on February 1, 2019, inadvertently requesting a deadline of March 3, 2019, a Sunday, for

1 Wilmington to file its response [ECF No. 14]. The Court granted the stipulation, entering a
2 response deadline of March 3, 2019 [ECF No. 16]. Because the Parties did not realize that the
3 requested deadline falls on a Sunday, the Parties request a brief extension for Wilmington to
4 respond to the Motion. Additionally, due to several unforeseen scheduling conflicts, Counsel for
5 Wilmington requests a brief extension to the deadline to respond to the Motion, from March 3,
6 2019 to **March 8, 2019**.

8 This is the Parties' second request for an extension and is not intended to cause delay or
9 prejudice to any party.

10 IT IS SO STIPULATED

11 DATED this 1st day of March, 2019.

12 **WRIGHT, FINLAY & ZAK, LLP**

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14
15 /s/ Lindsay D. Robbins
16 Lindsay D. Robbins, Esq.
17 Nevada Bar No. 13474
18 7785 W. Sahara Ave., Suite 200
19 Las Vegas, NV 89117
20 *Attorney for Plaintiff Wilmington
Trust, National Association,
not in its individual capacity but as
Trustee of ARLP Securitization Trust,
Series 2014-2*

DATED this 1st day of March, 2019.


**EARLY SULLIVAN WRIGHT GIZER &
McRAE LLP**

/s/ Sophia S. Lau, Esq.
Sophia S. Lau, Esq.
Nevada Bar No. 13365
601 South Seventh Street, 2nd Floor
Las Vegas, Nevada 89101
*Attorneys for Defendant, Commonwealth Land
Title Insurance Company*

ORDER

IT IS SO ORDERED.

24 DATED this 4 day of March, 2019.

25
26 
27 Gloria M. Navarro, Chief Judge
28 UNITED STATES DISTRICT COURT

1 *Respectfully submitted by:*

2 **WRIGHT, FINLAY & ZAK, LLP**

3
4 /s/ Lindsay D. Robbins, Esq.

Lindsay D. Robbins, Esq.

5 *Attorneys for Plaintiff*

CERTIFICATE OF SERVICE

6
7 I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and
8 that I electronically served the foregoing **STIPULATION AND PROPOSED ORDER**
9 **EXTENDING PLAINTIFF'S TIME PERIOD TO RESPOND TO COMMONWEALTH'S**
10 **MOTION TO DISMISS (Second Request)** was made on March 1, 2019, to all parties and
11 counsel as identified on the Court-generated Notice of Electronic Filing.
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14 /s/ Tonya Sessions

An Employee of WRIGHT, FINLAY & ZAK, LLP